

EXHIBIT C

Picard v. Estate of Seymour Epstein, et al./Proposed Judgment

Cremona, Nicholas J. [ncremona@bakerlaw.com]

Sent: Tuesday, February 02, 2021 11:58 AM

To: Helen Chaitman

Cc: Hoang, Lan [lhoang@bakerlaw.com]

Attachments: 10-04438_Epstein_Proposed~1.docx (26 KB)

Helen,

Judge Morris' recent decision in this matter directed the Trustee to submit a proposed order implementing her findings and conclusions. Accordingly, we enclose for your review a proposed order consistent with Local Bankruptcy Rule 9074-1(a). Please note that this order tracks Judge Morris' recent order implementing her decision in the Mann case, which had virtually the same findings and conclusions. Please advise if defendants consent to the attached so we may advise the Court whether the order is submitted on consent of all parties.

Thank you.

Nicholas J. Cremona

Partner

BakerHostetler

45 Rockefeller Plaza

New York, NY 10111-0100

T +1.212.589.4682

ncremona@bakerlaw.com

bakerlaw.com



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